

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANDREW CORZO, SIA HENRY, ALEXANDER
LEO-GUERRA, MICHAEL MAERLENDER,
BRANDON PIYEVSKY, BENJAMIN SHUMATE,
BRITTANY TATIANA WEAVER, and
CAMERON WILLIAMS, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA
INSTITUTE OF TECHNOLOGY, UNIVERSITY
OF CHICAGO, THE TRUSTEES OF COLUMBIA
UNIVERSITY IN THE CITY OF NEW YORK,
CORNELL UNIVERSITY, TRUSTEES OF
DARTMOUTH COLLEGE, DUKE UNIVERSITY,
EMORY UNIVERSITY, GEORGETOWN
UNIVERSITY, THE JOHNS HOPKINS
UNIVERSITY, MASSACHUSETTS INSTITUTE
OF TECHNOLOGY, NORTHWESTERN
UNIVERSITY, UNIVERSITY OF NOTRE DAME
DU LAC, THE TRUSTEES OF THE
UNIVERSITY OF PENNSYLVANIA, WILLIAM
MARSH RICE UNIVERSITY, VANDERBILT
UNIVERSITY, and YALE UNIVERSITY,

Defendants.

Case No.: 1:22-cv-00125

Hon. Matthew F. Kennelly

**[PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION TO COMPEL
PRODUCTION OF DOCUMENTS PURSUANT TO PLAINTIFFS' FIRST AND
SECOND SETS, AND CERTAIN REQUESTS IN PLAINTIFFS' THIRD SET, OF
REQUESTS FOR PRODUCTION OF DOCUMENTS**

The Court enters the following Order regarding Plaintiffs' Motion To Compel Production Of Documents Pursuant To Plaintiffs' First And Second Sets, and Certain Requests in Plaintiffs' Third Set, of Requests For Production Of Documents ("RFPs").

1. Plaintiffs' Motion to Compel is granted, and the following Defendants are directed to produce documents by April __, 2023, responsive to the following RFPs as to which they had not originally agreed to produce documents:

- a. Penn¹ shall produce documents responsive to RFP No. 2²;
- b. Penn shall produce documents responsive to RFP No. 3;
- c. Penn shall produce documents responsive to RFP No. 4;
- d. Penn shall produce documents responsive to RFP No. 7;
- e. Penn shall produce documents responsive to RFP No. 12;
- f. Penn shall produce documents responsive to RFP No. 14;
- g. Penn and Chicago shall produce documents responsive to RFP No. 16;
- h. All Defendants shall produce documents responsive to RFP No. 20;
- i. All Defendants other than Caltech shall produce documents responsive to RFP No. 22;
- j. All Defendants shall produce documents responsive to RFP No. 23;
- k. ND and Penn shall produce documents responsive to RFP No. 31;
- l. Duke and Penn shall produce documents responsive to RFP No. 38;
- m. ND shall produce documents responsive to RFP No. 48;
- n. ND, Chicago, Duke, Georgetown, and Yale shall produce documents responsive to RFP No. 49;

¹ For convenience, this Order utilizes the abbreviated name for each Defendant used in the Second Amended Complaint, except that the "University of Notre Dame du Lac" will be abbreviated as "ND" and "Johns Hopkins University" will be abbreviated as "JHU". These are the same abbreviated names used in Plaintiffs' Memorandum in support of the Motion resulting in this Order.

² All references to RFP numbers are to Plaintiffs' First Set of RFPs unless identified to the contrary.

- o. ND, Georgetown, and Penn shall produce documents responsive to RFP No. 51;
- p. All Defendants shall produce documents responsive to RFP No. 53;
- q. Chicago shall produce documents responsive to RFP No. 54;
- r. ND shall produce documents responsive to RFP No. 58;
- s. Caltech shall produce documents responsive to RFP No. 61;
- t. Chicago, Columbia, Duke, and Penn shall produce documents responsive to RFP No. 62;
- u. Chicago, Penn and Yale shall produce documents responsive to RFP No. 63;
- v. Penn shall produce documents responsive to RFP No. 70;
- w. Penn and Duke shall produce documents responsive to RFP No. 77;
- x. All Defendants shall produce documents responsive to RFP No. 83;
- y. Chicago, Emory, JHU, ND, Penn, and Yale shall produce documents responsive to RFP No. 88;
- z. Chicago, Emory, JHU, ND, Penn, and Yale shall produce documents responsive to RFP No. 98;
- aa. Emory, JHU, ND, Penn, and Yale shall produce documents responsive to RFP No. 103;
- bb. Emory, JHU, ND, and Penn shall produce documents responsive to RFP No. 113;
- cc. Emory, JHU, ND, and Penn shall produce documents responsive to RFP No. 114;

- dd. Chicago, Duke, Emory, JHU, ND, and Penn shall produce documents responsive to RFP No. 115;
- ee. Chicago, Emory, JHU, ND, and Penn shall produce documents responsive to RFP No. 116;
- ff. Georgetown, Emory, Cornell, Penn, Rice, Chicago, Dartmouth, JHU, ND, and Yale shall produce documents responsive to RFP No. 117;
- gg. Chicago shall produce documents responsive to RFP No. 124;
- hh. All Defendants other than Dartmouth and Duke shall produce documents responsive to RFP No. 126;
- ii. All Defendants other than Dartmouth and Duke shall produce documents responsive to RFP No. 127;
- jj. All Defendants shall produce documents responsive to RFP No. 128;
- kk. All Defendants shall produce documents responsive to RFP No. 129;
- ll. All Defendants shall produce documents responsive to RFP No. 131;
- mm. All Defendants other than Caltech shall produce documents responsive to RFP No. 132;
- nn. Brown, Dartmouth and Yale shall produce documents responsive to RFP No. 139;
- oo. Duke shall produce documents responsive to RFP No. 142;
- pp. All Defendants other than Duke shall produce documents responsive to RFP No. 150;
- qq. Northwestern and ND shall produce documents responsive to RFP No. 151;

rr. Chicago, Columbia, Emory and Yale shall produce documents responsive to RFP No. 157;

ss. Duke and Northwestern shall produce documents responsive to RFP No. 160;

tt. Chicago, Duke, and Penn shall produce documents responsive to RFP No. 163;

uu. All Defendants shall produce documents responsive to RFP No. 1 in Plaintiffs' Second Set of RFPs;

vv. Chicago shall produce documents responsive to RFP No. 2 in Plaintiffs' Second Set of RFPs;

ww. Georgetown, Caltech, Cornell, Rice, Chicago, Dartmouth, Brown, Columbia, JHU, and ND shall produce documents responsive to RFP No. 3 in Plaintiffs' Second Set of RFPs;

xx. All Defendants shall produce documents responsive to RFP No. 4 in Plaintiffs' Second Set of RFPs;

yy. All Defendants shall produce documents responsive to RFP No. 11 in Plaintiffs' Third Set of RFPs; and

zz. All Defendants shall produce documents responsive to RFP No. 13 in Plaintiffs' Third Set of RFPs;

2. All Defendants that have already agreed to produce responsive documents to the RFPs set forth in paragraph 1 of this Order shall remain obligated to do so, and this Order shall not affect that obligation;

3. Other than as amended by this Order, all Defendants shall remain subject to any and all discovery Orders entered by the Court and subject to all deadlines set forth in Case Management Order #1, Dkt. 195, and otherwise set by this Court.

SO ORDERED:

Dated: _____

Hon. Matthew F. Kennelly
United States District Judge